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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

JUL 13 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Review of the Commission's)
Rules Governing the Low Power)
Television Service)

MM Docket No. 93-114

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To: The Commission - Mail Stop 1170

COMMENTS OF SAN ANTONIO COLLEGE
A COLLEGE OF THE ALAMO COMMUNITY COLLEGE DISTRICT

The following are our comments to your invitation to
comment on the Community Broadcasters Association rule making
petition.

(1) Abandonment of the "Letter Perfect" Application Standard

We are in favor of this item. We feel a
"substantially complete" standard is acceptable,
particularly when an applicant is given notice about
minor defects, and the opportunity to correct such
defects.

(2) Expanded Use of Terrain Shielding

We are in favor of this item. The use of terrain
showings for pending applications, will reduce the number
of situations where a lottery must be held.

(3) Relaxed Definition of Minor Change

We are in agreement with relaxing the definition of
minor change. This will allow LPTV stations to expand
their coverage using a minor change application, instead
of a major change application, as long as the proposed
coverage area does not exceed a circle the radius of
which is the greatest distance to the station's
authorized 74 dBu in any direction.

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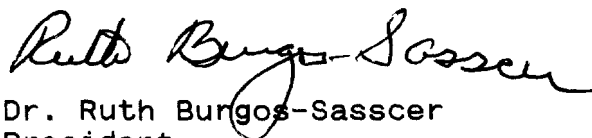
(4) Four-Letter Call Signs

We are also in total agreement with the use of a four-letter call sign, the type used today by full-power TV stations. This is of great importance to us for proper recognition by viewers, and potential program suppliers.

We are opposed to any type of special suffix appended to the four-letter call sign for LPTV stations.

On a separate issue, we would like to encourage the FCC to consider the use of higher power transmitters for LPTV stations. We understand this proposal has been put on hold until a decision has been reached on the future of the Advanced Television System. However, once the Advanced Television System is decided we would like to see this proposal brought forward.

Respectfully submitted,
San Antonio College



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June 25, 1993